

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division

Elizabeth Sines, et al

Plaintiffs

v

Jason Kessler, et al

Defendants

Case No: 17-cv-072

SWORN DECLARATION OF CHRISTOPHER CANTWELL AS TO THE UNITED  
STATES PENITENTIARY ("USP") MARION COMMUNICATIONS MANAGEMENT UNIT ("CMU")  
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I, Christopher Cantwell, do hereby aver under penalty of perjury this  
8th day of September, 2021, that the following is true and correct:

- 1) I am over the age of 18 and have personal knowledge of the following.
- 2) I am a federal prisoner serving a sentence of 41 months imprisonment in the United States Penitentiary ("USP") Marion Communications Management ("CMU").
- 3) The USP-Marion CMU consists primarily of a single housing unit comprised of four ranges; one range "B-range" is set aside as a Special Housing Unit ("SHU").
- 4) On the USP-Marion CMU's B-range is also a computer that inmates can use to view discovery; access to this computer is at the discretion of staff and this is the only computer on which discovery information can be viewed by inmates.
- 5) The computer of para 4, supra, lacks a printer or a means of obtaining screenshots of video.
- 6) Because of the facts of para 5, supra, I cannot produce from the dis-

covery or other electronically stored information that I do have documents that can be presented to the court.

- 7) I am unlearned in the law and "legally illiterate".
- 8) I am being assisted in this matter by lay counsel; William A White, who is known to the Court, Plaintiffs, and, other Defendants and is experienced in litigation as described in the attached declaration.
- 9) Specifically, for the past week, white and I have discussed the facts of this case, trial preparation and strategy, as well as how the Plaintiffs can be expected to present this case, what the witnesses may testify to, what strategies can be used on direct or cross-examination of witnesses, what the Federal Rules of Evidence and Civil Procedure are, what the elements are of the Plaintiff's claims, and, many other legal issues.
- 10) Prior to my discussions with White, I did not understand the elements of the Plaintiffs' claims, the required proofs, how my co-defendants' defaults were being used to build a case against me by implication falsely, my procedural rights in this matter and how to preserve and enforce them, and, most elements of this case, trial procedure, the rules governing this case, and, the law.
- 11) White is not being permitted by the USP-Marion CMU staff to view the electronically released discovery and filings with me.
- 12) I need White to review the Second Amended Complaint, the expert reports, and, the videos of the events complained of in this matter, as well as the rest of the electronically stored information in this matter so that he can advise me of my rights and help me articulate my positions to the Court.

  
Christopher Cantwell